REMARKS

The present response cancels claims 7-9, 14, 18, and 22 without prejudice or disclaimer as to the subject matter recited therein. In addition, claims 1, 2, 6, 10, and 19 have been amended. Claims 1-6, 10-13, 15-17, 19-21, and 23-25 remain pending in the captioned case. Further examination and reconsideration of the presently claimed application are respectfully requested.

Objection to the Drawings

An objection was asserted against Figs. 1 and 2 for failing to be designated as "Prior Art." Applicants respectfully disagree. Nowhere in the present application is there any mention that Figs. 1 and 2 are prior art, or that these figures contain in their entirety that which is noted as prior art under the patent statutes. While Figs. 1 and 2 may be known to the present inventors as showing a legacy client/server system, nowhere is there any mention that the legacy client/server system, shown in its modified form in Figs. 1 and 2, meet the statutory requirement of prior art. Moreover, there is no admission whatsoever that what is illustrated contains only that which is old as alleged in the Office Action. Accordingly, Applicants respectfully request the Examiner to provide a prior art reference describing present Figs. 1 and 2, or otherwise remove this objection in its entirety.

Section 103 Rejection

Claims 1-3, 5-23, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,073,147 to Chan et al. (hereinafter "Chan"). In addition, claims 4 and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chan in view of www.linktionary.com by Tom Sheldon (hereinafter "Sheldon"). Since claims 4 and 24 depend from respective independent claims 1 and 19, Applicants assert that amended claims 1 and 19, as well as independent claim 10, are patentably distinct over Chan or a combination of Chan and Sheldon.

To establish a case of *prima facie* obviousness of a claimed invention, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. Second, there must be a reasonable expectation of success. As stated in MPEP 2143.01, the fact that references can be hypothetically combined or modified is not sufficient to establish a *prima facie* case of obviousness. *See In re Mills*, 916 F.2d. 680 (Fed. Cir. 1990). Finally, the prior art references must teach or suggest all the claim limitations.

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In re Royka, 490 F.2d. 981 (CCPA 1974); MPEP 2143.03 (emphasis added). Specifically, "all words in a claim must be considered when judging the patentability of that claim against the prior art." *In re Wilson* 424 F.2d., 1382 (CCPA 1970). Using these standards, Applicants contend that the cited art fails to teach or suggest all features of the currently pending claims, some distinctive features of which are set forth in more detail below.

The cited art does not teach or suggest a second request sent from a second (server) computer to a first (client) computer as an X logical font descriptor. Each of the present independent claims 1, 10, and 19 have been amended to recite a second request sent from the second (server) computer to the first (client) computer. The second request is for a text stream and comprises an X logical font descriptor. The present specification makes clear what is meant by an X logical font descriptor. Specifically, when using an X window system to provide windowing services in network computers, an X protocol is used. The X window system and X protocol that utilize an X client and an X server in a device dependent and device independent layers is described briefly in the present specification (Specification -- pg. 2, line 14 - pg. 3, line 20). When employing the X window system for sending X protocol between a client and server, the X window model reverses the normal client-server paradigm. In a X window model, instead of a server servicing a client, a client is typically the larger more powerful computer servicing a server so that "events" will propagate from the server to the client. The X client then will send a request to the X server asking the X server to interact with the graphics adapter local to that server (Specification -- pg. 3, line 22 - pg. 4, line 7). However, a problem exists when using the X client and X server model within an X window network system. Specifically, if the X server maintains the rasterizer function, then any GUI associated with the client's application "may present a substantially different (and sometimes unsatisfactory) look and feel, depending on the X server being used" (Specification -- pg. 4, lines 9-26).

Thus, Fig. 1 illustrates a X client and X server network arrangement where a request is sent from the client to the server (Specification -- Fig. 1). However, if the X client is executing a platform independent program, such as a JAVA application, then an image needed for display by the client will not appear the same when displayed by a remote server, since the remote server contains font codes, for example, that have a visual representation different from font codes that may be drawn from the JAVA application running on the local platform of the X client (Specification -- pg. 6, line 6 - pg. 8, line 11). Thus, while it would be desirable to have a single API for JAVA applications that would be platform independent, it would also be desirable that the API for the client produce consistent, high-quality text drawings by placing the rasterizer and associated X logical font descriptor within the JVM of the client

rather than the remote server (Specification -- pg. 10, lines 1-10; compare and contrast Figs. 1 and 2 vs. Fig. 3). By placing the X logical font descriptor within the client so that a JAVA X font server 32 is formed, the font server within the client is compatible to the JAVA application also running within the client to maintain a consistent look and feel for all fonts and glyphs produced therefrom.

Contrary to a client containing a X logical font descriptor for consistent look and feel of a GUI as claimed and described in the present specification, Chan specifically makes no mention of any client/ server hierarchy, much less a X window network system or a X logical font descriptor contained within a X client. Accordingly, absent any suggestion of a X window network system or, specifically, a X logical font descriptor within such system placed in the X client as a JAVA X font server, Chan cannot fulfill the requisite obviousness standards set forth in MPEP 2143.03. Simply referring to "any suitable communication network" in Chan does not fulfill the requirements of a *prima facie* case of obviousness under MPEP 2143.01. The fact that a X window network system or a X logical font descriptor within a X client is within the capabilities of Chan to one of ordinary skill in the art is not sufficient by itself to establish *prima facie* obviousness. *Ex parte Levengood*, 28 USPQ 2nd. 1300 (Bd. Pat. App. & Inter. 1993). Instead, there must be some objective reason contained within Chan to modify the general statement of "any network" to that of a specific type of network -- a X window network that performs as a inverse client/server network typically unconventional in the networking realm.

The cited are does not teach or suggest a first (client) computer that can execute a JAVA application program or a rasterizer within a JAVA virtual machine (JVM) (i.e., a font server program). Each of the present independent claims 1, 10, and 19 not only define a X logical font descriptor, but specifically a client computer that executes a JAVA application program as well as a rasterizer within a JVM. The purpose of executing both a JAVA application program and a rasterizer within a JVM is to maintain JAVA compatibility of the symbols or glyphs produced from the font server since both are JAVA compatible and, therefore, operate from a common platform. Once the rasterizer performs its bitmap output, then that bitmap is sent to the server with a consistent look and feel regardless of the font chosen. The bitmap image is then consistently displayed to the display device.

Nowhere in Chan is there any mention of JAVA. Specifically, there is no mention of a client/server network architecture or a client that executes a JAVA application as well as a rasterizer program within a JVM. Accordingly, absent any suggestion, Chan cannot be used to render the present independent claims obvious since Chan simply does not suggest all that which is claimed. While Sheldon generally describes a X window system and a basic client/server system, there is no mention whatsoever

of any client executing a JAVA application program, or a client executing a rasterizer within a JVM. Therefore, Chan and Sheldon, either singularly or in combination, fail to render the present independent claims obvious.
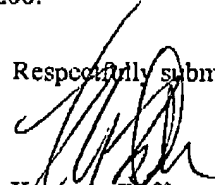
For at least the reasons stated above, Applicants assert that independent claims 1, 10, and 19, as well as claims dependent therefrom, are patentably distinct over the cited art. Accordingly, Applicants respectfully request removal of this objection.

CONCLUSION

The present amendment and response is believed to be a complete response to the issues raised in the Office Action mailed October 21, 2004. In view of the remarks traversing the rejections, Applicants assert that pending claims 1-6, 10-13, 15-17, 19-21, and 23-25 are in condition for allowance. If the Examiner has any questions, comments or suggestions, the undersigned attorney earnestly requests a telephone conference

Should any fees be required, the Commissioner of hereby authorized to charge such fees to Daffer McDaniel, LLP Deposit Account No. 50-3268/5468-07200.

Respectfully submitted,

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